

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

V.

CODY J. HANSEN

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Case No.: 1:18-CR-00082-PAS

**MOTION FOR RECONSIDERATION OF BAIL**

Now comes Defendant, Cody Hansen, by and through counsel, and hereby petitions this Honorable Court to reconsider its decision to deny his release on bail. As grounds, the Defense avers the following:

1. On May 23, 2018, Mr. Hansen was charge by Criminal Complaint with (1) Attempted Enticement of a Minor, in violation of 18 U.S.C. § 2422(b); (2) Attempt to Transfer Obscene Material to a Minor, in violation of 18 U.S.C. § 1470; and (3) Travel with Intent to Engage in Illicit Sexual Conduct, in violation of 18 U.S.C. § 2423(b).

2. He appeared before the Court on May 30, 2018 for a detention hearing. After consideration, the Court ordered that Mr. Hanson be remanded into custody. The Court further ordered that he may file a motion for reconsideration in the future.

3. Mr. Hansen was eventually indicted with (1) Attempted Enticement of a Minor, in violation of 18 U.S.C. § 2422(b); (2) Attempt to Transfer Obscene Material to a Minor, in violation of 18 U.S.C. § 1470; and (3) Travel with Intent to Engage in Illicit Sexual Conduct, in violation of 18 U.S.C. § 2423(b).

4. He was arraigned on June 11, 2018. At that time, he entered pleas of not guilty to the charged offenses. The Court again ordered that he be remanded into custody.

5. Defense counsel, John L. Calcagni III, Esq., entered his appearance for Mr. Hansen on July 13, 2018.

6. Since entering this case, Attorney Calcagni has learned of Mr. Hansen's military

Background (Attachment A), service-connected disabilities, and present psychological conditions for which he requires treatment.

7. Mr. Hansen has undergone in-person and telephonic interviews by various representatives of the Department of Veterans Affairs for consideration of acceptance into a VA in-patient mental health program. Mr. Hansen has been accepted into a 100-day in-patient program called the Bedford VA Domiciliary Program located in Bedford, MA (Attachments B and C). He has also been accepted as a potential patient with the Behavioral Addictions Clinic, which is collocated on the Bedford VA campus and operated by Dr. Shane W. Kraus, Ph.D. Aside from running this clinic, Dr. Kraus is a member of the Domiciliary Program staff.

8. Based on the foregoing and attached materials, the Defense requests that this motion be granted and that be granted bail, under GPS monitoring, supervision by U.S. Pretrial Services, and on the condition that be admitted to and remain in the in-patient treatment program at the Bedford MA.

Respectfully submitted  
Defendant,  
Cody J. Hanssen  
By his Counsel

/s/ John L. Calcagni III  
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### **CERTIFICATION**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on November 5, 2018.

/s/ John L. Calcagni III

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